

## UNITED STATES DISTRICT COURT

for the

Northern District of California

**FILED**

Jun 26 2024

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLANDUnited States of America  
v.

Case No. 4:24-mj-70948-MAG

Casey Robert Goonan

**FILED UNDER SEAL***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 1, 2024 in the county of Alameda in the  
Northern District of California, the defendant(s) violated:*Code Section*

18 U.S.C. 844(f)(1)

*Offense Description*Damage or Destruction by Means of Fire or Explosive -- Property Owned or  
Possessed by the United States or Any Institution Receiving Federal  
Financial AssistancePENALTIES: Imprisonment of 5 to 20 years, \$250,000 fine, 5 years  
supervised release, \$100 Special Assessment

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent Tiffany Speirs

☒ Continued on the attached sheet.

Approved as to form

  
AUSA N. Bhagat

/s/ Tiffany Speirs

*Complainant's signature*

Tiffany Speirs, Special Agent, FBI

*Printed name and title*

Sworn to before me by telephone.

Date: 06/26/2024City and state: Oakland, California*Judge's signature*

LAUREL BEELER

Hon. Kandis A. Westmore, U.S. Magistrate Judge

*Printed name and title*

FILED UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Tiffany Speirs, a Special Agent with the Federal Bureau of Investigation (FBI), having been duly sworn, hereby depose and state as follows:

**INTRODUCTION**

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant charging Casey Robert GOONAN (“GOONAN”) with violating Title 18, United States Code, Section 844(f)(1), damaging or destroying a building, vehicle, or other property by means of fire or an explosive, where that property is owned, possessed by, or leased to the United States or any agency thereof, or any institution or organization receiving Federal financial assistance.

**SOURCES OF INFORMATION**

2. The facts in this affidavit come from my personal observations, my training and experience, information from records and databases, and information obtained from other agents, officers, and witnesses. Where statements made by other individuals (including other Special Agents and law enforcement officers) are referenced in this Affidavit, such statements are described in sum and substance and in relevant part. Similarly, where information contained in reports and other documents or records is referenced in this Affidavit, such information is also described in sum and substance and in relevant part.

3. Because this Affidavit is submitted for the limited purpose of establishing probable cause for a criminal complaint and arrest warrant, I have not included every fact known to me about this case. Rather, I have set forth only the facts that I believe are necessary to support probable cause for a criminal complaint and arrest warrant. My understanding of the facts and circumstances of the case may evolve as the investigation continues.

**AFFIANT BACKGROUND**

4. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7); that is, an officer of the United States who is empowered by

FILED UNDER SEAL

law to conduct investigations of, and to make arrests for, offenses enumerated in 18 U.S.C. § 2516.

5. I am an FBI Special Agent and have been so employed since 2023. I am currently assigned to a domestic terrorism squad. As a Special Agent, my duties include investigating individuals who commit violent criminal acts in furtherance of their political or social ideology. I have participated in several investigations of individuals who have committed criminal acts in furtherance of ideological goals, to include violent extremism. I have also assisted with the execution of search warrants in several domestic terrorism investigations.

6. I have undergone 21 weeks of training to include completed training in physical surveillance, interviewing and interrogation techniques, legal statutes and procedures, confidential source management, search warrant techniques and procedures, arrest warrant techniques and procedures, and electronic surveillance techniques, among other skills.

7. I have personally participated in the investigation discussed in this affidavit. I am familiar with the facts and circumstances of the investigation through my personal participation in it based on several investigative techniques, including discussions with other Special Agents of the FBI, Special Agents of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and law enforcement officers with the University of California Police Department and the California Office of the State Fire Marshal, and review of records and reports relating to the investigation. Unless otherwise noted, wherever in this affidavit I assert that a statement was made, the statement is not being recounted verbatim but instead only in substance and in part. Facts not set forth herein, or in any attached exhibits, are not being relied on in reaching my conclusion that the requested order should be issued. Nor do I request that this Court rely on any facts not set forth herein in reviewing this application.

**APPLICABLE LAW**

11. Title 18, United States Code, Section 844(f)(1) makes it unlawful to maliciously damage or destroy, or attempt to damage or destroy, by means of fire or an explosive, any

FILED UNDER SEAL

building, vehicle, or other personal or real property in whole or in part owned or possessed by, or leased to . . . any institution or organization receiving Federal financial assistance.

**STATEMENT OF PROBABLE CAUSE**

12. Based on the facts set forth below, I believe there is probable cause to believe that on June 1, 2024, GOONAN used several destructive devices—Molotov cocktails—to damage and destroy a parked University of California Police Department (UCPD) vehicle.

***Firebombing of UCPD Vehicle***

13. I have reviewed footage from various security cameras and have learned the following. On June 1, 2024, at approximately 4:55 a.m., a dark blue fourth generation (2011-2015) Honda CRV with no rear license plate, equipped with silver roof rails and black cross bars (the “SUSPECT VEHICLE”) was being operated on the streets of Berkeley, California, in the Northern District of California.

14. At approximately 4:57 a.m., the SUSPECT VEHICLE stopped at the intersection of Bancroft Way and Telegraph Avenue in Berkeley, California, adjacent to the University of California, Berkeley campus. The SUSPECT VEHICLE remained stopped for approximately one minute. Several marked UCPD vehicles were parked on Barrows Lane near Bancroft Way. Anyone inside the SUSPECT VEHICLE would have had a view of those vehicles. I believe that the extended stop at that location is consistent with a person conducting reconnaissance.

15. At approximately 5:01 a.m., the SUSPECT VEHICLE parked at the northeast corner of the intersection of Durant Avenue and Bowditch Street in Berkeley, California. A tall white male, wearing dark colored pants, a dark colored hoodie, and a white mask (SUSPECT 1), exited the passenger side of the vehicle, carrying what appeared to be a large dark colored reusable shopping bag that appeared to be weighed down by its contents.

16. At approximately 5:04 a.m., SUSPECT 1 was observed walking westbound on Bancroft Way before turning northbound on Barrows Lane. SUSPECT 1 set down the shopping bag, kicked it under the fuel tank area of a marked UCPD patrol car, and ignited it. The patrol car caught on fire.

FILED UNDER SEAL

17. Shortly thereafter, a witness walked into the UCPD lobby and reported that he saw a male in dark clothing walk west on Bancroft Way, turn north onto Barrows Lane, and then use a blow torch style lighter to ignite something near the left rear tire of a UCPD patrol car.

18. UCPD officers extinguished the fire, but not before it caused damage to the rear seats, trunk, and fuel port of the vehicle.

19. A subsequent search of the shopping bag revealed that it contained six Molotov cocktails, each consisting of a particular brand beer bottle filled with ignitable liquid (which was later confirmed to be gasoline) and stuffed with paper towels, which appeared to be designed to act as wicks. The six Molotov cocktails were placed on top of a piece of plywood inside of the reusable shopping bag.

20. I have reviewed surveillance video that shows at approximately 5:05 to 5:06 a.m., SUSPECT 1 returned to the SUSPECT VEHICLE and re-entered the passenger side. The SUSPECT VEHICLE drove off. During my review of surveillance video, I did not see the driver of the vehicle exit the SUSPECT VEHICLE between the time that SUSPECT 1 exited the vehicle and the time that SUSPECT 1 re-entered the vehicle.

21. I have viewed surveillance video footage that shows that approximately 10:39 a.m., a vehicle matching the description of the SUSPECT VEHICLE parked on Bancroft Avenue just west of Barrows Lane. A person who appeared to match the description of SUSPECT 1 exited the vehicle and, using what appears to be a mobile telephone, took several photographs of the UCPD vehicle that had been lit on fire earlier in the day from different angles.

22. The SUSPECT VEHICLE then proceeded south on Bowditch Street. approximately 10:42 a.m., a security camera captured an image of the front license plate. I have reviewed this footage.

***Identification of Suspect as Casey Robert GOONAN***

23. The front license plate of the SUSPECT VEHICLE is associated with a vehicle registered to Casey Robert GOONAN at an address on Vicente Street in Oakland, California.

24. California Department of Motor Vehicles (DMV) records reveal that GOONAN

FILED UNDER SEAL

was born in 1990; his DMV photograph, as well as his physical description in DMV records—6'2" and 175 pounds—is consistent with the video surveillance images of SUSPECT 1.

25. On June 4, 2024, UCPD officers located the SUSPECT VEHICLE parked in the driveway outside of a residence on Merian Drive in Pleasant Hill, California.

26. On June 16, 2024, a California Superior Court judge issued a warrant to search, among other locations, the SUSPECT VEHICLE, GOONAN's person, and the residence on Merian Drive.

27. Law enforcement officers executed the warrant on June 17, 2024. During the search of the Pleasant Hill residence, officers found, among other things, the following:

- a. in a room identified by GOONAN's mother as belonging to him, a crate of reusable shopping bags and several pieces of mail addressed to GOONAN at True Leap Press at a particular P.O. Box in Concord, California.
- b. in a room adjacent to GOONAN's room, a mobile telephone that belonged to GOONAN<sup>1</sup> and a blue reusable shopping bag of a type similar to the bag containing the destructive devices that was recovered from underneath the UCPD vehicle on June 1, 2024.

28. During the search of the SUSPECT VEHICLE, officers found, among other things:

- a. a black trash bag containing a shirt with a mask in the pocket, and discarded disposable gloves
- b. a box containing matches
- c. lighter fluid
- d. a gasoline container containing a liquid that smelled of gasoline
- e. two lighters

---

<sup>1</sup> GOONAN previously provided a telephone number in connection with his September 2023 arrest in San Francisco. Officers identified this telephone as belonging to GOONAN because it rang when they dialed that number.

FILED UNDER SEAL

29. Law enforcement submitted samples from the Molotov cocktails' paper towel wicks that were recovered on June 1, 2024 to the Alameda County Criminalistics Laboratory for DNA processing. The laboratory was also provided with buccal swabs that were taken from GOONAN on June 17, 2024.

30. With respect to one of the paper towel samples, the laboratory concluded that GOONAN could not be excluded as a possible source of DNA, and that the probability of an unrelated, randomly selected individual having the same DNA profile as the DNA profile detected on the sample was at least 1 in 1.66 billion. With respect to another sample, the laboratory concluded that GOONAN could not be excluded as a possible source of DNA, and that the probability of an unrelated, randomly selected individual having the same DNA profile as the DNA profile detected on the sample was at least 1 in 764,000.

***Internet Postings Regarding Attack***

31. I am aware of a blog called "Abolition Media" that is hosted on a platform that advertises itself as providing "blogs without logs" and allows users to "blog whatever content you prefer" with the assurance that the platform does not retain a log of users' activity or any information about them.

32. There is a blog post on "Abolition Media" dated June 2, 2024,<sup>2</sup> titled "Student Intifada as our Historical Duty: Fulfill it or Betray it." The blog post was accompanied by three pictures of the damaged UCPD police vehicle that appear to have been taken from similar angles from which SUSPECT 1 was observed taking pictures on June 1, 2024.

33. The post read, in part: "Around 4am on June 1 2024, an incendiary device was placed below a UC Berkeley police vehicle parked in front of UCPD station. The device was lit underneath the back left wheel of a police SUV, placed between the tire and underside of fuel tank. There were too many people around at the time to see the final result. Unsure if it caught

---

<sup>2</sup> The post is dated June 2, 2024, but I know from both public Internet postings and WHOIS records that the blog is hosted on a server run by an organization based in Europe, so this post could have been made on June 1, 2024 or June 2, 2024. To my knowledge, a law enforcement officer first saw the post on June 2, 2024.

FILED UNDER SEAL

the tire and fuel tank. But the device has enough fuel in it to torch the entire car if it was successfully placed.”

34. The post went on to declare that the firebombing was done in retaliation against UCPD and the University of California, and ended with “Death to amerikkka Glory to the martyrs *submitted anon by email*”

35. In my training and experience and based upon my knowledge of the investigation thus far—specifically, that the post contained information that had not been made public, such as the location of the device and the approximate timing of the attack—I believe the blog post could only have been authored by a person with intimate knowledge of the attack on the UCPD police vehicle, likely either SUSPECT 1 or the driver of the SUSPECT VEHICLE.

36. On June 2, 2024, an ATF Special Agent observed the above-described Abolition Media post linked on a social media account attributed to True Leap Press. The account’s biography describes True Leap Press as an “autonomous publishing collective & distro.”

37. True Leap Press’s website attributes GOONAN as the author of at least two essays and also identifies him as an editor for “Propter Nos,” a collection of essays published by True Leap Press. The website invites individuals to contact “True Leap Zine Distro” at a particular P.O. Box in Concord, California. During the search of GOONAN’s room, officers found several pieces of mail addressed to him and/or True Leap Press at that P.O. Box.

38. I have learned from a U.S. Postal inspector that the P.O. Box in question was opened by GOONAN on or about December 27, 2021. As part of his application for the P.O. Box, GOONAN provided a home address of the Merian Drive residence that officers searched in Pleasant Hill and a telephone number belonging to the telephone that they found at the residence.

***Characteristics of the University of California and the Damaged Vehicle***

39. The patrol vehicle that was damaged on June 1, 2024 is owned by and in the possession of the Regents of the University of California.

40. According to a fact sheet published by the University of California Office of the President in May 2024, during the 2022-23 fiscal year, the University of California received

FILED UNDER SEAL

more than \$15.9 billion in federal support, including approximately \$5.8 billion in program support, approximately \$8.4 billion for patient care, and approximately \$1.7 billion in student financial aid. In Fiscal Year 2023, the University of California received approximately \$3.84 billion in federal agency research funding.

41. The University of California and the UCPD conduct business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce.

42. According to the National Highway Traffic Safety Administration, the damaged patrol vehicle was assembled at a vehicle plant in Michigan, so it necessarily traveled in interstate commerce to arrive in California.

43. The damaged patrol vehicle, which bears UCPD markings, was regularly used by sworn California peace officers in their duties to, among other things, protect the public, enforce the laws, and provide emergency aid to individuals in areas of the UCPD's primary and concurrent jurisdiction.

44. Under Policy 104 of the UCPD Berkeley Policy Manual, UCPD maintains primary responsibility for the main Berkeley campus, as well as all University of California owned or controlled structures and properties which are occupied within the City of Berkeley limits and other adjacent jurisdictions. This includes the Lawrence Berkeley National Laboratory, which is managed by the University of California on behalf of the United States Department of Energy.

//

//

//

//

//

//

//

FILED UNDER SEAL

CONCLUSION

45. For the foregoing reasons, I submit that there is probable cause to believe that Casey Robert GOONAN has violated Title 18, United States Code, Section 844(h)(1) and respectfully request that a Criminal Complaint and Arrest Warrant issue.

*/s/ Tiffany Speirs*

\_\_\_\_\_  
Tiffany Speirs  
Special Agent  
Federal Bureau of Investigation

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d) on the 26<sup>th</sup> day of June, 2024.

\_\_\_\_\_  
LAUREL BEELER  
United States Magistrate Judge

